

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS  
NEW YORK, NEW YORK 10036  
(212) 223-0400  
FAX: (212) 753-0396  
www.zeklaw.com

35 MASON STREET  
GREENWICH, CT 06830  
(203) 622-0900  
FAX: (203) 862-9889

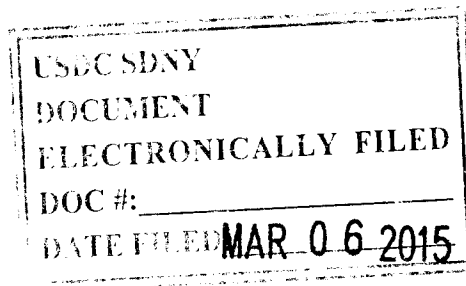
STEVEN S. RAND  
(212) 826-5307  
srand@zeklaw.com

103 EISENHOWER PARKWAY  
ROSELAND, NJ 07068  
(973) 618-9100  
FAX: (973) 364-9960

March 5, 2015

VIA ECF

Honorable Katherine B. Forrest  
United States District Judge  
United States Courthouse  
500 Pearl Street, Room 1950  
New York, New York 10007



**Grand Manor Health Related Facility, Inc. v. Koskinen, et al.,**  
**Civ. No. 14-10130 (KBF)**

Dear Judge Forrest:

I am counsel to defendant Berkadia Commercial Mortgage LLC ("Berkadia") in the referenced matter. On consent of all parties, I am writing to request a two-week extension, to Monday, March 23, 2015, of Berkadia's time to answer the Complaint in this action. Our Answer is due on Monday, March 9, 2015. Berkadia requests this extension as the parties are working toward a resolution of a final stipulation and interim stay agreement to resolve the dispute in this action. Berkadia has made no previous request for an extension of time to answer the Complaint.

We thank the Court for its attention to this matter.

Respectfully submitted,

*Steven S. Rand*  
Steven S. Rand

SSR:mzg

cc: Roy Breitenbach, Esq. (by ECF)  
John Macron, Esq. (via email)  
Natasha L. Waglow, Esq. (via email)

*So ordered.*  
*K B. For*  
*usd*

*3/6/15*